

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

POLYSCIENCES, INC.,

Plaintiff,

v.

JOSEPH T. MASRUD,

Defendant.

Civil Action No. 2:20-CV-03649-PBT

DECLARATION OF ANDREW OTT

I, Andrew Ott, of full age, hereby declare, under penalty of perjury, as follows:

1. I am Executive Vice President and Chief Operating Officer at Polysciences, Inc. (“Polysciences”). I have held this position since 2018 and held the position of Vice President from February 2015 until then. I am responsible for the daily activities at Polysciences.

2. I reviewed Joseph Masrud’s and Mathew Griffin’s email accounts, while they were employees of Polysciences, Inc.

3. I found evidence that Mathew Griffin shared with Mr. Masrud a folder named “salesdata” via Dropbox on or about September 10, 2018. (A true and correct copy is attached hereto as Exhibit A.)

4. I found evidence that on July 10, 2019, Mathew Griffin emailed himself a full export of all Polysciences, Inc. sales data transactions from 2013 through July 9, 2019. (A true and correct copy is attached hereto as Exhibit B.)

Dated: September 3, 2020

By: 
Andrew Ott